

Nov 24, 2021

s/ JDH

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America )

v. )

Clyde Lewis Springfield )

dob: xx/xx/1984 )

Case No. **21-M-534 (SCD)**

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 29, 2021 to present in the county of Milwaukee in the  
Eastern District of Wisconsin, the defendant(s) violated:*Code Section*

18 U.S.C. Section 1204

*Offense Description*

International parental kidnapping

This criminal complaint is based on these facts:

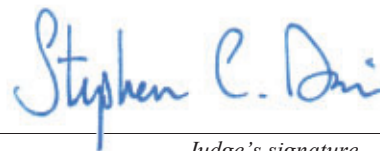
See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

HSI SA Nathan Cravatta

Printed name and title

Sworn via telephone; transmitted via email  
pursuant to Fed. R. Crim. 4.1Date: 11-24-21

Judge's signature

City and state: Milwaukee, Wisconsin

Hon, Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

## AFFIDAVIT

I, Nathan A. Cravatta, having been duly sworn, depose and state as follows:

1. I am a Special Agent with the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), and have been so employed since May 2005. I am currently assigned to the HSI Office of the Resident Agent in Charge in Milwaukee, Wisconsin. My duties include investigating criminal violations relating to child exploitation and child pornography including violations of advertising, producing, distributing, receiving, and possessing child pornography, in violation of Title 18, United States Code, Sections 2251 and 2252. I have received training in the investigation of child pornography and child exploitation offenses and have observed and reviewed numerous examples of electronically stored child pornography.

2. The information contained in this affidavit is based primarily on information I learned during the course of my investigation into alleged criminal activity of Clyde Lewis-Springfield. I have also reviewed reports from this investigation prepared by other law enforcement officers, including investigators with the West Allis Police Department. As the reports were prepared by other law enforcement officers during the course of their official duties, I believe them to be reliable.

## SUMMARY

3. The purpose of this affidavit is to provide information to show that there is probable cause to believe that Clyde Lewis-Springfield has committed International Parental Kidnapping in violation of 18 U.S.C. § 1204. He did so by removing his three

minor children and one adult son from the United States to South Africa with the intent to obstruct the parental rights of Noemi Moralez, the biological mother of all four children.

4. On November 9, 2021, case agents learned from officers with the West Allis Police Department that Clyde Lewis-Springfield had departed the United States on October 30, 2021 from Milwaukee, Wisconsin enroute to Johannesburg, South Africa with his three minor children, Maria C. Lewis, Mariah M. Lewis, Avryanna S. Lewis, and adult son, Ramon D. Lewis. They were scheduled to return to the United States on November 3, 2021 but have failed to return.

### **BACKGROUND**

5. According to information received from the West Allis Police Department, on November 6, 2021, Noemi I. Moralez reported Clyde A. Lewis-Springfield, who is the father of her four children, left the United States with the children and failed to return them in accordance with their child custody agreement. She reported Lewis-Springfield took the children to South Africa for a supposed mission trip with an unidentified church. Lewis-Springfield took custody of the children, Maria C. Lewis (DOB 04/28/2008), Mariah M. Lewis (DOB 04/28/2008), Avryanna S. Lewis (DOB 10/30/2005), and adult son, Ramon D. Lewis (DOB 10/02/2003), on October 29, 2021 and was supposed to return Maria, Mariah and Ramon to her custody on November 3, 2021 at 2:00 p.m. To date, the children have not been returned to her custody. Although Ramon is an adult, he is a senior at North Division High School. Ms. Moralez was not aware of any plans for her children to travel out of the country and all four

children have been missing school since November 1, 2021.

6. On November 9, 2021, the West Allis Police Department contacted HSI to verify if Clyde Lewis-Springfield and the children had departed the United States. Department of Homeland Security (DHS) database indices determined Clyde Lewis-Springfield and the children departed the United States from Hartsfield-Jackson International Airport in Atlanta, Georgia via Delta Airlines flight number 72. They arrived at O.R. Tambo International Airport (JNB) in Johannesburg, South Africa on October 31, 2021. They were scheduled to depart on November 3, 2021 from Johannesburg, South Africa enroute to Milwaukee, Wisconsin. DHS indices indicate Lewis-Springfield and the children did not board their scheduled flight. On this date, the West Allis Police Department entered all minor children as missing in the National Crime Information Center (NCIC), a law enforcement database which allows criminal justice agencies to enter and search for stolen property, missing and wanted persons, domestic violence protection orders, obtain criminal histories on queried subjects, and access to the National Sex Offender Registry.

7. On November 15, 2021, I obtained and reviewed court records from the Milwaukee County Circuit Court relating to family court case number 2006FA001320. According to records received, on September 20, 2021, the Court ordered both the mother, Noemi Moralez and father, Clyde Lewis-Springfield, "to have joint custody and shared placement of the children Ramon, a minor at the time of this hearing, Maria C. Lewis and Mariah M. Lewis following a 2-2-3 schedule. The father shall continue to have primary place of Avryanna S. Lewis and the mother's primary placement of

Avryanna S. Lewis shall continue to be as agreed between the mother and Avryanna S. Lewis. The father shall not be involved when the mother and Avryanna S. Lewis make arrangements for placement. All placement exchanges shall continue to occur at 2 p.m....The parties shall have vacation and holiday placement as specified in the Amended GAL (Guardian ad Litem) Report filed on 09/20/2021, which is incorporated herein. The receiving parent shall be responsible for transportation during holiday placement, unless otherwise agreed between the parties. Both parties shall cooperate fully with one another as it relates to obtaining passports for the children. The mother shall sign and return all necessary and relevant passport documentation for the children within 7 days of receiving it." A review of the Guardian ad Litem recommendations adopted by the Court indicate, "parties to each have two non-consecutive 1 week blocks of vacation per year with 60 day written notice and include an itinerary if traveling..."

8. An additional review of court records indicate on April 26, 2006, both Clyde Lewis-Springfield and Noemi Morales signed and acknowledged the receipt of family court orders. One condition the court ordered was, "Whoever intentionally causes a child to leave, take a child away or withholds a child for more than 12 hours beyond the court-approved period of physical placement or visitation period from a legal custodian with intent to deprive the custodian of his or her custody rights without consent of the custodian is guilty of a Class C Felony, which is punishable of by a fine not exceed \$10,000 or imprisonment not to exceed 10 years or both...."

9. On November 15, 2021, I obtained passport applications for Clyde Lewis-Springfield, Maria C. Lewis, Mariah M. Lewis, Avryanna S. Lewis, and Ramon D.

Lewis. According to records received, passports for the aforementioned were issued on October 28, 2021. The passports applications for Maria C. Lewis, Mariah M. Lewis, and Avryanna S. Lewis are signed by Clyde Lewis-Springfield. The listed country to visit on these applications was noted as being South Africa with a travel date of October 29, 2021. The return date is noted as being "open". A "Statement of Consent: Issuance of a U.S. Passport to a Child" accompanied passport applications for Maria C. Lewis, Mariah M. Lewis, and Avryanna S. Lewis. These consent forms were signed by Noemi Moralez on September 29, 2021. The consent forms signed by Noemi Moralez were done so by a court's order. The consent forms were not accompanied by the passport applications. The passport applications were filled out separately by Clyde Lewis-Springfield.

10. On November 15, 2021, a bench warrant was issued by the Milwaukee County Circuit Court for Clyde Lewis-Springfield Jr. for two counts of Interfering with Custody in violation of Wisconsin State Statute 948.31(3)(c).

11. On November 16, 2021, HSI Special Agent Thomas Koch and I telephonically interviewed Noemi Moralez. Ms. Moralez explained during this interview she was involved in an abusive relationship with Clyde Lewis-Springfield and terminated this relationship in 2016. She also indicated Lewis-Springfield had been physically abusive toward her children in the past. She stated for approximately five years she has been in a child custody battle with Lewis-Springfield and she communicates very little with him. She indicated in September 2021, Lewis-Springfield requested to obtain passports for their children. She did not approve of this due to the

COVID pandemic and the possibility of being stranded in a foreign country. She explained Lewis-Springfield did not provide her 60 days advance notice, as required by their family court order, that he was traveling with the children. She indicated on November 1, 2021, Lewis-Springfield sent an email with screen shots of flight information for her children listing travel from Milwaukee to Atlanta to Johannesburg with an arrival date of October 30, 2021. He also provided return flight information from Johannesburg to London to Detroit to Milwaukee with an arrival date of November 3, 2021.

12. On November 17, 2021, a subpoena was issued to Google LLC requesting records related to email address [clewis8425@gmail.com](mailto:clewis8425@gmail.com), an email address identified as being used by Clyde Lewis-Springfield. According to records received, this account is subscribed to "Clyde Lewis." Internet Protocol (IP) login records obtained indicate on November 12, 2021, logins into this account occurred from IP address 41.113.249.161. Database queries indicate this IP address geo-locates to Johannesburg, South Africa.

13. On November 18, 2021, I was provided email communication between Noemi Morales and Clyde Lewis-Springfield. On November 1, 2021, Lewis-Springfield sent an email with screen shots of flight information for her children listing travel from Milwaukee to Atlanta to Johannesburg with an arrival date of October 30, 2021. He also provided return flight information from Johannesburg to London to Detroit to Milwaukee with an arrival date of November 3, 2021.

14. On November 3, 2021, Clyde Lewis- Springfield send an additional email to Noemi Morales indicating, "I've been dreading to send this message to you because

of the 'I told you so'. Not sure if you checked your emails or not and gotten my messages(itinerary, pics, etc.)We came out here to Africa to visit the ministry we've been apart of and ro visit the motherland for Avryanna's Sweet 16....I regret to inform you that we missed our flight last night and couldn't get retested for covid to board having to forfeit our tickets(7k) and are currently stuck. We had gotten an additional test in ATL which was supposed to validate our return but unfortunately did not. I spent all day trying to strategize a plan & all we can do at this point is come up with the funds to get back. I do have some people assisting with places to stay and work so hopefully it doesn't take too long but I'm going to work myself and most likely Ramon as well to come up with the lost money. We don't have cell service and I'll try to work on that asap but when we are near Wi-Fi we can communicate. The kids are happy and safe...."

15. On November 12, 2021, Noemi Morales sent an email to Clyde Lewis-Springfield inquiring about he and the children's return to the United States and their present location. She also asked about speaking to the children. Clyde Lewis-Springfield replied, "I understand your concern. The children are really good and learning a lot and enjoying the experiences. We don't have Wi-Fi all the time and I'm trying to get local phone service asap - our phones are not working the same. I've sent what I have and am able to. We've been at the CHL hotel, guesthouses, with the ministry in Joburg. All of which are very pleasant. I didn't think that was going to be an issue after all of the research we've done. They've tried calling you and weren't able to get through and they've been texting you daily. You can talk to them as much as you'd



like. You can also reach me on the same numbers I've given you when internet is available. They have what's called load shedding out here where power is and can be out for a lengthy time... We've been looking at different options with school which they've also shared with you and even going back to the U.S. the children aren't interested going back to school(physically) with covid and everything else. So I'm more than likely going to purchase a program that's suitable. So with alternatives failing won't be an option just changes window and could be earlier for the girls. It just won't be traditional. It's plenty of work and I am working side jobs with people and winter break looks ideal to make up for any losses which they've also shared. Ramon is interested in working so he'll probably be helping out. There are jobs opportunities for us both. Like I said I understand your concern and I assure you they're in great hands. We have the LORD on our side & everything happens for a reason. They'll try calling again soon. We're going to the store to prepare for the weekend”.

16. Additionally, on this date, Noemi Morales sent an email to Clyde Lewis-Springfield requesting an exact address where “you guys are staying.” To date, she has not received a reply to her inquiry.

17. On November 17, 2021, a subpoena was issued to Delta Airlines requesting flight reservation records for Clyde Lewis-Springfield, Maria C. Lewis, Mariah M. Lewis, Avryanna S. Lewis, and Ramon D. Lewis. According to records received, the flight reservation to Johannesburg, South Africa was made on October 6, 2021. The flight reservation to return to Milwaukee from Johannesburg, South Africa was made on October 28, 2021. This reservation was cancelled on November 2, 2021.